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10 Attorneys for Defendant,
HEWLETT-PACKARD COMPANY

11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13 SAN JOSE DIVISION

14
15 In re: HP INKJET PRINTER LITIGATION

MASTER FILE NO. CO53580 JF

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18 JOINT STIPULATION AND PROPOSED
19 ORDER RE REVISED DISCOVERY AND
20 PRETRIAL SCHEDULE

This Document Relates To:

All Actions

1 WHEREAS, the parties previously agreed upon and the Court approved Case Management
 2 Order No. 2 setting forth a discovery and pretrial schedule in this case;

3 WHEREAS, the parties have been pushing forward with discovery pertaining to the issues to
 4 be presented to the Court on class certification;

5 WHEREAS, the parties agree that additional time is needed in order to complete such
 6 discovery before the briefing and hearing on class certification;

7 THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and between the
 8 undersigned counsel that the Case Management Order be revised to include the following discovery
 9 and pretrial schedule:

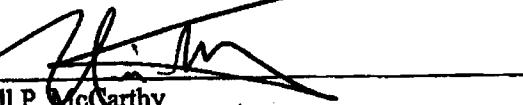
11 June 30, 2007	Last day for both parties to disclose expert witnesses to be used in connection with class certification.
12 July 11, 2007	Last day for both parties to disclose rebuttal expert witnesses to be used in connection with class certification.
14 July 20, 2007	Last day for Plaintiffs to file: (1) expert report on class certification; and (2) motion for class certification.
15 September 14, 2007	Last day for Defendant to file: (1) expert report on class certification; and (2) opposition to motion for class certification.
17 October 5, 2007	Last day for Plaintiffs to file motion for class certification reply.
18 October 26, 2007	Hearing on motion for class certification.
19 December 14, 2007	All non-expert discovery closes.
20 January 18, 2008	Last day to file dispositive motions.
21 February 8, 2008	Last day to file opposition to dispositive motions.
22 February 22, 2008	Last day to file dispositive motion reply briefs.
23 March 7, 2008	Hearing on dispositive motions.
24 90 days before trial	Last day to exchange expert reports on merits.
25 60 days before trial	Last day for parties to serve rebuttal expert reports on merits.
26 45 days before trial	Expert discovery closes.
27 May 12, 2008	Last day for settlement conference.

1 May, 2008 Pretrial conference.
2 30 days before trial Last day to exchange pretrial disclosures.
3 20 days before trial Last day to file objections to pretrial disclosures.
4 June, 2008 Trial begins.

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6 In addition to the above agreed-upon schedule, Defendant reserves the right to file a motion
7 for summary judgment on the claims of any individual named plaintiff at any time prior to January
8 11, 2008 (which is the last day to file dispositive motions), and to notice the hearing of such a motion
9 on or before October 19, 2007, (the hearing date set for plaintiffs' motion for class certification).
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11 Before Defendant files such a motion, however, Defendant will first meet and confer in good
12 faith with Plaintiffs regarding the timing of that motion.

13 **IT IS SO STIPULATED.**
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1
2 Dated: February 23, 2007
3

4 By: 
5 Niall P. McCarthy
6 COTCHETT, PHRE & McCARTHY
7

8 Patrick McNicholas
9 MCNICHOLAS & MCNICHOLAS LLP
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11 Jonathan Shub
12 SEEGER WEISS LLP
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14 *Co-Lead Counsel for Plaintiffs and the Class*
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19 David Buchanan
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25 Marc Edelson
26 EDELSON & ASSOCIATES, LLC
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34 LAW OFFICES OF SCOTT E. SHAPIRO, P.C.
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36 *Counsel for Plaintiffs and the Class*
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38 Dated: February 23, 2007
39

40 By: 
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42 Samuel G. Liversidge
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45 John F. Schultz*
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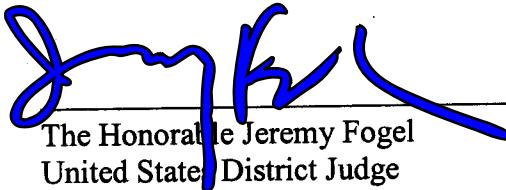
51 * *Pro Hac Vice pending*
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1 [PROPOSED] ORDER
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Good cause having been shown, the Joint Stipulation re Revised Discovery and Pretrial
Schedule is hereby adopted by the Court and the parties are ordered to comply with this Order.

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5 **IT IS SO ORDERED.**

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7 Dated: 3/8/07


The Honorable Jeremy Fogel
United States District Judge

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